

October 3, 2019

VIA ECFS AND HAND DELIVERY

Marlene H. Dortch, Secretary Federal Communications Commission Office of the Secretary 445 12th Street, SW Washington, DC 20554 Joseph P. Bowser Richmond Office (804) 441-8701 (direct) jbowser@rothjackson.com

RE: AT&T Services, Inc. and AT&T Corp. v. 123.Net (d/b/a Local Exchange Carriers of Michigan and/or Prime Circuits)
Proceeding Number 19-222
Bureau ID Number EB 19-MD-007

Dear Ms. Dortch:

On behalf of 123.Net (d/b/a Local Exchange Carriers of Michigan and/or Prime Circuits) ("LEC-MI"), I have enclosed for filing via ECFS the Public Version of its Amended Answer and Legal Analysis in Opposition to AT&T's Formal Complaint in this matter ("Answer"), along with its 47 C.F.R. § 1.721(m) verification, supporting exhibits, Information Designation, Declaration of Michael Starkey, and First Request for Interrogatories to AT&T. The amendments conform the record citations to the new bates-stamped version of the exhibits and include Mr. Irvin's verification. As contemplated by the Commission's rules and the August 7, 2019 Notice of Formal Complaint, all confidential information has been redacted from this Public Version. For clarity's sake, the only information redacted from the Public Version are the AT&T documents in Exhibit C to Mr. Starkey's Declaration.

LEC-MI is separately filing via hand delivery an original and three (3) additional unredacted copies (marked as "Courtesy Copies. EB-MDRD, 202-418-7330") of the Confidential Version of its Amended Answer filing package. In addition, copies of both versions of the submission are being served via email on AT&T's counsel and Commission counsel.

Please date stamp the additional copy of this letter enclosed with the Confidential Version and return the stamp-and-return copy to the courier. Please contact me if you have any questions regarding this filing.

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Respectfully submitted,

Joseph P. Bowser COUNSEL FOR 123.NET

Enclosures

cc: Christi Shewman, Counsel for Complainant Brian A. McAleenan, Counsel for Complainant Michael J. Hunseder, Counsel for Complainant Marc A. Korman, Counsel for Complainant Adam Suppes, FCC Lisa Saks, FCC